

**NW 1.01      Please specify how long AT&T has been receiving its bills for  
Operator Services (OS) and Directory Assistance (DA) services from  
SBC in the RBS or resale billing system format?**

**AT&T RESPONSE TO NW 1.01:**

AT&T has been receiving the OS and DA bills from SBC through its RBS billing system since AT&T's entry into the market, which for residential service was June 2002, and for business service was July 2001.

Information provided by:  
Shannie Marin  
AT&T Manager  
510-276-8436

Witness: Karen Moore

**NW 1.02      Please indicate if AT&T currently receives the OS and DA bills from SBC in a timely manner? Also, please state if the bills are accurate?**

**AT&T RESPONSE TO NW 1.02:**

Currently AT&T is receiving OS and DA bills by the scheduled receipt date; however, an inaccurate bill that is issued prior to the scheduled receipt date is not "timely".

Accuracy has been and continues to be an issue. SBC's current RBS bills combine charges for OS and DA, Daily Usage (DUF) transmission charges and alternately billed service charges. The bills do not provide detail as a necessary means to verify billing accuracy. The bills only provide a "919" code (a code developed by SBC for RBS billing) and the quantity of billing for the code with the charges. In response to AT&T's repeated request for the breakdown of these codes, SBC provides its CLEC Handbook as the source for this information. AT&T has reviewed the CLEC Handbook and it does not provide sufficient detail. For example, with respect to code 919211, SBC advised in September 2002, that code 919211 was specifically for alternately billed service calls. SBC's CLEC handbook defines the code as being for toll; this information is incomplete, confusing for the CLECs and insufficient to allow for bill verification. To further complicate verification of bill accuracy, in January 2003, SBC advised that the 919211 code previously confirmed by SBC to only represent alternately billed service calls, in fact does contain other call types. Although AT&T has asked for the breakdown of the other call types, it has not been provided by SBC as of May 23, 2003.

In using SBC's RBS billing system, usage validation can only occur on a manual basis. If the OS and DA bills were formatted in CABs and delivered electronically, the usage validation of accuracy and expense content could be performed electronically rather than manually.

Information provided by:  
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Witness: Karen Moore

**NW 1.04      Please provide the appropriate pages or specifications from the OBF that establish the guidelines for OS and DA services to be billed out of CABS. Please indicate when these guidelines were established?**

**AT&T RESPONSE TO NW 1.04:**

The OBF is a forum to which companies bring issues for resolution by industry representatives. The industry representatives conduct meetings and review sessions, and the OBF issues Resolution Statements which document what actions need to be taken. When an issue is placed in Final Closure status at the OBF, it is referred to the Technical Review Group (TRG) for implementation in the CABS Guidelines. The OBF Guidelines encourage OBF member companies (which include both AT&T and SBC Illinois) to comply with OBF guidelines and resolution statements. Compliance is voluntary; however, it is the compliance of the members that allows and provides for consistency in the industry.

The Carrier Access Billing System Billing Output Specifications (CABS BOS) Guidelines do accommodate the billing of Operator Services and Directory Assistance charges in an unbundled environment. The CABS BOS Guidelines contain 6 volumes. Volume 2 - Attachment 1-1-23A Unbundled Network Elements cites "operator and directory assistance calls" in the Description paragraph. The Description reads: "The FCC issued an Order (96-325) concerning the Implementation of the Local Competition Provisions in the Telecommunications Act. As part of this Order, Incumbent Local Exchange Carriers are to provide nondiscriminatory access to network elements on an unbundled basis. These Unbundled Elements, as first defined, included: local loops, local and tandem switches, interoffice transmission facilities, network interface device (NID), signaling and call-related database facilities, operations support systems functions, and operator and directory assistance calls." Operator Services and Directory Assistance charges can be billed on a Type of Account (TOA) J/Unbundled Line Port bill using values for the Unbundled Miscellaneous Element. The values for the Unbundled Miscellaneous Element are found in CABS BOS Volume 4 Page U12.

In addition, Directory Assistance charges could also be billed on a Type of Account (TOA) U/Local Products and Services bill along with other miscellaneous charges (e.g. E911, directory listing). CABS BOS Volume 2 - Attachment 1-1-19 Local Products and Services cites "DA" in the Associated Values paragraph. That paragraph reads: "Interim Number Portability and Local Products and Services (e.g., DA and white page listings, 3rd party billing) may be billed on the same type of account. The Type of Account Value that should be used for these services is "U".

Information provided by:  
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**NW 1.06      Please indicate if AT&T has made a request for OS and DA services to be billed out of CABS through the CLEC User Forum (CUF)? If so, please specify: (1) when the request was initiated; (2) what CUF issue number was assigned; and (3) what is the status of the request?**

**AT&T RESPONSE TO NW 1.06:**

AT&T has not requested OS and DA services to be billed out of CABS at a CLEC forum.

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